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U.S. DISTRICT COURT
N.D. OF ALABAMA

EXHIBIT 3

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SYNOVUS BANK,

Plaintiff.

VS.

C.A. No. CV-2010-90218.00
[JURY TRIAL REQUESTED]

PLASH ISLAND RESORT, LLC; KEITH
ROTENBERRY; LEWIS M. LOCKHART; RICHARD
D. ROWE; NIOLAOS MANKIDES; RICKEY L.
LOCKHARD; WILLIAM R. IVEY; MICHAEL W.
McCAIN; CHRISTOPHER ANDREW YARBOROUGH;
ESTATE OF GARY L. MARCRUM, SR.; DONA S.
MARCRUM, ADMINISTRATOR; and MARCURM
DEVELOPMENT, LLC,

Defendants.

PLASH ISLAND RESORT, LLC,

Defendant/Third Party Plaintiff,

VS.

BP, PLC; BP AMERICA, INC.; BP PRODUCTS
NORTH AMERICA, INC.; BP AMERICA
PRODUCTION COMPNY; BP EXPLORATION
AND PRODCTION, INC.; ANADARKO
PETROLEUM CORPORATION; ANADARKO
E & P COMPANY, LP; MOEX OFFSHORE
2007, LLC; TRANSOCEAN, LTD; TRANSOCEAN
DEEPWATER, INC.; TRANSOCEAN OFFSHORE
DEEPWATER DRILLING, INC.; TRANSOCEAN
HOLDINGS, LLC; TRITON ASSET LEASING GMBH;
HALLIBURTON ENERGY SERVICES, INC.;
M-I, LLC; DRILQUIP, INC.; CAMERON
INTERNATIIONAL CORPORATION f/k/a
COOPER CAMERON CORPORATION; JOHN and
JANE DOES A-Z; and CORPORATIONS A-Z.

Third party Defendants.

CONSENT TO, AND JOINDER IN, REMOVAL

Defendant Dril-Quip, Inc., pursuant to 28 U.S.C. §1446, hereby give notice that it consents to the Notice of Removal filed by Defendant Cameron International Corporation f/k/a Cooper Cameron Corporation.

Dated: February /6, 2011

Don Jackson

By: 6

Ware, Jackson, Lee, Chambers America Tower, 42nd Floor 2929 Allen Parkway Houston, TX 77019 713-659-6400 713-659-6262 (fax)

Lee Kaplan Smyser, Kaplan & Veselka, LLP Bank of America Center 700 Louisiana, Suite 2300 Houston, TX 77002 713-221-2300 713-221-2320 (fax)

ATTORNEYS FOR DRIL-QUIP, INC.

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IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ALABAMA SOUTHERN DIVISION

SYNOVOUS BANK,

Plaintiff,

VS.

C.A. No. CV-2010-90218.00 [JURY TRIAL REQUESTED]

PLASH ISLAND RESORT, LLC; KEITH
ROTENBERRY; LEWIS M. LOCKHART; RICHARD
D. ROWE; NIOLAOS MANKIDES; RICKEY L.
LOCKHARD; WILLIAM R. IVEY; MICHAEL W.
McCAIN; CHRISTOPHER ANDREW YARBOROUGH;
ESTATE OF GARY L. MARCRUM, SR.; DONA S.
MARCRUM, ADMINISTRATOR; and MARCURM
DEVELOPMENT, LLC,

Defendants.

PLASH ISLAND RESORT, LLC,

Defendant/Third Party Plaintiff,

VS.

BP, PLC; BP AMERICA, INC.; BP PRODUCTS
NORTH AMERICA, INC.; BP AMERICA
PRODUCTION COMPNY; BP EXPLORATION
AND PRODCTION, INC.; ANADARKO
PETROLEUM CORPORATION; ANADARKO
E & P COMPANY, LP; MOEX OFFSHORE
2007, LLC; TRANSOCEAN, LTD; TRANSOCEAN
DEEPWATER, INC.; TRANSOCEAN OFFSHORE
DEEPWATER DRILLING, INC.; TRANSOCEAN
HOLDINGS, LLC; TRITON ASSET LEASING GMBH;
HALLIBURTON ENERGY SERVICES, INC.;
M-I, LLC; DRILQUIP, INC.; CAMERON
INTERNATIIONAL CORPORATION f/k/a
COOPER CAMERON CORPORATION; JOHN and
JANE DOES A-Z; and CORPORATIONS A-Z.

Third party Defendants.

CONSENT TO REMOVAL

Third Party Defendant Halliburton Energy Services, Inc., pursuant to 28 U.S.C. § 1446, hereby gives notice that it consents to the Notice of Removal filed by Third Party Defendant Cameron International Corporation.

Dated: February 22011

Donald E. Godwin
Bruce W. Bowman, Jr.
Jenny Martinez
Floyd R. Hartley, JR.
Gavin E. Hill
Godwin Ronquillo PC
1201 Elm Street, Suite 1700
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Mobile, AL 36652
(251) 432-5521
(251) 432-0633 (fax)

ATTORNEYS FOR HALLIBURTON ENERGY SERVICES, INC.

SYNOVOUS BANK,	§ §
Plaintiff,	§ C.A. No. 01-CV-2010-90218.00
VS.	§ [JURY TRIAL REQUESTED]
PLASH ISLAND RESORT, LLC; KEITH ROTENBERRY; LEWIS M. LOCKHART; RICHARD D. ROWE; NIOLAOS MANKIDES; RICKEY L. LOCKHARD; WILLIAM R. IVEY; MICHAEL W. McCAIN; CHRISTOPHER ANDREW YARBOROUGH; ESTATE OF GARY L. MARCRUM, SR.; DONA S. MARCRUM, ADMINISTRATOR; and MARCURM DEVELOPMENT, LLC,	
Defendants.	\$
PLASH ISLAND RESORT, LLC,	§ 8
Defendant/Third Party Plaintiff,	\$ 8
vs.	\$ \$
BP, PLC; BP AMERICA, INC.; BP PRODUCTS NORTH AMERICA, INC.; BP AMERICA PRODUCTION COMPNY; BP EXPLORATION AND PRODCTION, INC.; ANADARKO PETROLEUM CORPORATION; ANADARKO E & P COMPANY, LP; MOEX OFFSHORE 2007, LLC; TRANSOCEAN, LTD; TRANSOCEAN DEEPWATER, INC.; TRANSOCEAN OFFSHORE DEEPWATER DRILLING, INC.; TRANSOCEAN HOLDINGS, LLC; TRITON ASSET LEASING GMBH; HALLIBURTON ENERGY SERVICES, INC.; M-I, LLC; DRILQUIP, INC.; CAMERON INTERNATIIONAL CORPORATION f/k/a COOPER CAMERON CORPORATION; JOHN and JANE DOES A-Z; and CORPORATIONS A-Z.	
Inira party Defendants.	8

BP DEFENDANTS' CONSENT TO, AND JOINDER IN, REMOVAL

BP Exploration and Production, Inc.; BP America, Inc.; BP Products North America, Inc.; and BP America Production Company (collectively the "BP Defendants"), pursuant to 28 U.S.C. §1446, hereby give notice that they consent to and join in the Notice of Removal filed by Defendant Cameron International Corporation.

Dated: February ___, 2011

By: /s/ Marchello D. Gray
John M. Johnson
Adam K. Peck
William H. Brooks
Marchello D. Gray
Lightfoot, Franklin & White, L.L.C.
400 20th Street North
Birmingham, AL 35203
(205) 581-0700
(205) 581-0799 (fax)

Attorneys for BP Defendants

OF COUNSEL: Richard C. Godfrey, P.C. J. Andrew Langan, P.C. Kristopher Ritter Kirkland & Ellis, LLP 300 North LaSalle Street Chicago, IL 30654 (312) 862-200 (312) 862-2200 (fax)

Jeffrey Clark Aditya Bamzai Kirkland & Ellis, LLP 655 Fifteenth St., N.W. Washington, DC 20005-5793 (202) 879-5000 (202) 879-5200 (fax)

SYNOVOUS BANK,	§ 8
Plaintiff,	§ §
vs.	§ § §
PLASH ISLAND RESORT, LLC; KEITH ROTENBERRY; LEWIS M. LOCKHART; RICHARD D. ROWE; NIOLAOS MANKIDES; RICKEY L. LOCKHARD; WILLIAM R. IVEY; MICHAEL W. McCAIN; CHRISTOPHER ANDREW YARBOROUGH; ESTATE OF GARY L. MARCRUM, SR.; DONA S. MARCRUM, ADMINISTRATOR; and MARCURM DEVELOPMENT, LLC, Defendants.	§ Case No § \$ § (removed from Circuit Court § Jefferson County Alabama § C.A. No. CV-2010-90218.00 § [JURY TRIAL REQUESTED])
Defendants.	y [John Handragons 122])
PLASH ISLAND RESORT, LLC,	§
Defendant/Third Party Plaintiff,	§ §
vs.	\$ \$ &
BP, PLC; BP AMERICA, INC.; BP PRODUCTS NORTH AMERICA, INC.; BP AMERICA PRODUCTION COMPNY; BP EXPLORATION AND PRODCTION, INC.; ANADARKO PETROLEUM CORPORATION; ANADARKO E & P COMPANY, LP; MOEX OFFSHORE 2007, LLC; TRANSOCEAN, LTD; TRANSOCEAN DEEPWATER, INC.; TRANSOCEAN OFFSHORE DEEPWATER DRILLING, INC.; TRANSOCEAN HOLDINGS, LLC; TRITON ASSET LEASING GMBH; HALLIBURTON ENERGY SERVICES, INC.; M-I, LLC; DRILQUIP, INC.; CAMERON INTERNATIIONAL CORPORATION f/k/a COOPER CAMERON CORPORATION; JOHN and JANE DOES A-Z; and CORPORATIONS A-Z.	
Third Party Defendants.	\$

CONSENT TO AND JOINDER IN REMOVAL

Pursuant to 28 U.S.C. §1446, Third Party Defendants Anadarko Petroleum Corporation, Anadarko E&P Company, LP, and MOEX Offshore 2007 LLC (collectively "Third Party Defendants") hereby consent to and join in the notice of removal filed by Third Party Defendant Cameron International Corporation f/k/a Cooper Cameron Corporation ("Cameron").

- 1. Third Party Defendants consent to and join in the removal of this action from the Circuit Court of Jefferson County, Alabama, to the United States District Court for the Northern District of Alabama, Southern Division, upon the grounds set forth in Cameron's notice of removal.
- 2. Undersigned counsel is appearing for the Third Party Defendants for the limited purpose of this removal and does not waive any rights, defenses, or objections, including, but not limited to, those related to sufficiency of process, service of process, whether service of process was actually perfected, or any jurisdictional defenses which may be raised.

WHEREFORE, Anadarko Petroleum Corporation, Anadarko E&P Company, LP, and MOEX Offshore 2007 LLC adopt and incorporate by reference the notice of removal filed by Cameron in this action.

Dated:	 , 201	

Respectfully submitted,

/s/ Joel M. Kuehnert
Joel M. Kuehnert
(jkuehnert@babc.com)

Sid J. Trant (TRANS4885) (strant@babc.com)
R. Thomas Warburton (twarburton@babc.com)

Bradley Arant Boult Cummings LLP

One Federal Place 1819 Fifth Avenue North Birmingham, AL 35203 Telephone: (205) 521-8000 Facsimile: (205) 521-8800

ATTORNEYS FOR ANADARKO PETROLEUM CORPORATION, ANADARKO E&P COMPANY, LP, AND MOEX OFFSHORE 2007 LLC

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2020 K Street, NW Washington, DC 20006-1806 Telephone (202) 373-6000 Facsimile (202) 373-6001

CERTIFICATE OF SERVICE

I hereby certify that on foregoing with the Clerk of the Court notification of such filing to counsel of	, 2011, I electronically filed the using the CM/ECF system which will send record for all parties.
	/s/ Joel M. Kuehnert

SYNOVUS BANK,

Plaintiff.

V\$.

C.A. No.

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[JURY TRIAL REQUESTED]

PLASH ISLAND RESORT, LLC; KEITH
ROTENBERRY; LEWIS M. LOCKHART; RICHARD
D. ROWE; NIOLAOS MANKIDES; RICKEY L.
LOCKHARD; WILLIAM R. IVEY; MICHAEL W.
McCAIN; CHRISTOPHER ANDREW YARBOROUGH;
ESTATE OF GARY L. MARCRUM, SR.; DONA S.
MARCRUM, ADMINISTRATOR; and MARCURM
DEVELOPMENT, LLC,

Defendants.

PLASH ISLAND RESORT, LLC,

Defendant/Third Party Plaintiff,

vs.

BP, PLC; BP AMERICA, INC.; BP PRODUCTS
NORTH AMERICA, INC.; BP AMERICA
PRODUCTION COMPNY; BP EXPLORATION
AND PRODCTION, INC.; ANADARKO
PETROLEUM CORPORATION; ANADARKO
E & P COMPANY, LP; MOEX OFFSHORE
2007, LLC; TRANSOCEAN, LTD; TRANSOCEAN
DEEPWATER, INC.; TRANSOCEAN OFFSHORE
DEEPWATER DRILLING, INC.; TRANSOCEAN
HOLDINGS, LLC; TRITON ASSET LEASING GMBH;
HALLIBURTON ENERGY SERVICES, INC.;
M-I, LLC; DRILQUIP, INC.; CAMERON
INTERNATIIONAL CORPORATION f/k/a
COOPER CAMERON CORPORATION; JOHN and
JANE DOES A-Z; and CORPORATIONS A-Z.

Third party Defendants.

CONSENT TO, AND JOINDER IN, REMOVAL

Defendant M-I, LLC, pursuant to 28 U.S.C. §1446, hereby give notice that it consents to the Notice of Removal filed by Defendant Cameron International Corporation f/k/a Cooper Cameron Corporation.

Dated: February 18, 2011

By: ____/S/____

Hugh E. Tanner
Morgan, Lewis & Bockius L.L.P.
1000 Louisiana Street
Suite 4000
Houston, TX 77002
713-890-5180
713-890-5400 (fax)

ATTORNEYS FOR DEFENDANT M-I LLC

PLASH ISLAND RESORT, LLC)	
Plaintiff,	
v.)	Civil Action No.:
BP P.L.C.; BP AMERICA INC.; BP PRODUCTS NORTH AMERICA, INC.; BP AMERICA PRODUCTION) COMPANY; BP EXPLORATION & PRODUCTION INC.; ANADARKO PETROLEUM CORPORATION; ANADARKO E&P COMPANY, LP; MOEX OFFSHORE 2007, LLC; TRANSOCEAN LTD.; TRANSOCEAN DEEPWATER, INC.; TRANSOCEAN OFFSHORE DEEPWATER DRILLING, INC.; TRANSOCEAN HOLDINGS, LLC; TRITON ASSET LEASING GMBH; HALLIBURTON ENERGY SERVICES, INC.; M-I, LLC; DRILLQUIP, INC.; CAMERON INTERNATIONAL CORPORATION F/K/A COOPER CAMERON CORPORATION; JOHN AND JANE DOES A-Z; and CORPORATIONS A-Z.	
Defendants.	

CONSENT TO REMOVAL

Transocean Deepwater, Inc.; Transocean Offshore Deepwater Drilling, Inc;

Transocean Holdings, LLC; and Triton Asset Leasing GMBH, pursuant to 28 U.S.C. §

1446, hereby give notice that they consent to the Notice of Removal filed by Defendant Cameron International Corporation.

Dated: February 21, 2011

/s/Blane H. Crutchfield

BLANE H. CRUTCHFIELD DOUGLAS L. McCOY Attorneys for Defendants Transocean Offshore Deepwater Drilling Inc., Transocean Deepwater Inc., Transocean Holdings LLC and Triton Asset Leasing GmbH

OF COUNSEL:

HAND ARENDALL LLC Post Office Box 123 Mobile, Alabama 36601 Telephone: (251) 432-5511 Facsimile: (251) 694-6375

E-mail: <u>bcrutchfield@handarendall.com</u> E-mail: <u>dmcoy@handarendall.com</u>

Defendants expressly reserve their objections to personal jurisdiction, process, and service of process and expressly reserve all available defenses.